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November 20, 2020

VIA ECF AND E-MAIL

Hon. Dennis M. Cavanaugh, U.S.D.J. (ret.)
McElroy, Deutsch, Mulvaney & Carpenter LLP
1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, New Jersey 07962-2075

**Re: MSP Recovery Claims, Series LLC, et al. v. Sanofi-Aventis US LLC, et al.
Civil Action No. 18-2211 (BRM)(LHG)**

Dear Judge Cavanaugh:

We write to follow up on the parties' November 13, 2020 correspondence concerning the status of a confidentiality order and ESI protocol. The parties have agreed on a confidentiality order, which we will file with the court as a stipulation. The parties are still discussing an ESI protocol and thus request another extension of the date for their submission regarding that document. In light of next week's holiday, the parties propose to report back to Your Honor by the end of the week of November 30 concerning the status of the ESI protocol.

If the foregoing meets with Your Honor's approval, we request that this letter be "so ordered."

Respectfully submitted,

s/ Christopher Walsh
Christopher Walsh

CW/rvw

IT IS on this 23rd day of November, 2020
SO ORDERED.

Hon. Dennis M. Cavanaugh, U.S.D.J.